## IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS **EASTERN DIVISION**

SCOTT FARNSWORTH,	)
	)
Plaintiff,	)
	) Case No. 08 C 254
VS.	)
	) Hon. Judge Zagel
	)
THE STANLEY WORKS, INC. a	) Magistrate Judge Shenkier
Connecticut corporation, d/b/a	)
NATIONAL WORKS,	)
	)
Defendant.	

## MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER AND HIPAA AUTHORIZATION

Defendant The Stanley Works ("Stanley Works"), by its attorneys, and pursuant to Rule 26 of the Federal Rules of Civil Procedure, hereby moves for entry of a protective order governing disclosure of certain documents produced in this litigation. In support of this motion, Stanley Works states as follows:

- 1. The parties have served requests for production of documents pursuant to Rule 34 of the Federal Rules of Civil Procedure.
- 2. Counsel for the parties have conferred regarding reasonable and necessary steps to protect certain confidential and/or trade secret information from disclosure or use outside of the contours of this litigation, and they have agreed to the Agreed Protective Order And HIPAA Authorization that is attached hereto as Exhibit A.
  - It is the desire of counsel for the parties that this Court enter the attached order. 3.

4. Pursuant to Honorable Judge Zagel's Case Management Procedures, and in addition to the filing of this motion, Stanley Works will submit the attached order in WordPerfect format electronically to <a href="mailto:Proposed Order Zagel@ilnd.uscourts.gov">Proposed Order Zagel@ilnd.uscourts.gov</a>.

WHEREFORE, Stanley Works respectfully requests that this Court enter the attached Agreed Protective Order And HIPAA Authorization.

DATED: June 25, 2008 Respectfully submitted,

THE STANLEY WORKS

By: s/Peter R. Bulmer
One of Its Attorneys

Peter R. Bulmer Carmen B. Copher Jackson Lewis LLP 320 West Ohio Street, Suite 500 Chicago, IL 60610 (312) 787-4949 (Telephone) (312) 787-4995 (Facsimile) Attorneys for Defendant

## **CERTIFICATE OF SERVICE**

The undersigned, an attorney, hereby certifies that on this 25<sup>TH</sup> day of June, 2008, the foregoing Motion For Entry Of Agreed Protective Order And HIPAA Authorization was electronically filed with the Clerk of the U.S. District Court for the Northern District of Illinois using the CM/ECF system, which will send notification of such filing to the following counsel of record and CM/ECF participants:

> Ronald J. Broida, Esq. Joseph K. Nichele, Esq. Robin K. Mills, Esq. Broida and Associates, Ltd. 1250 East Diehl Road Suite108 Naperville, Illinois 60563

> > /s/ Carmen B. Copher Carmen B. Copher